

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:18-CR-452-1-FL

UNITED STATES OF AMERICA,

v.

LEONID ISAAKOVICH TEYF,

Defendant.

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MOTION TO SEAL

Leonid I. Teyf, by and through counsel, hereby requests the response to the Government's Sealed Motion (DE 104) filed at Doc. No. 134, be sealed until ordered unsealed by the Court so that information contained therein will not be made public.

Leonid I. Teyf, by and through counsel, hereby responds to the Government's motion filed under seal (DE 104 and sealed pursuant to DE 107). The Government's motion included information with profound negative consequences for an individual, not charged with a criminal offense, both personally and professionally. The proposed sealed response discusses assertions made about the activities of an individual not charged with a criminal offense. Disclosure of such assertions to the public at this stage might cause prejudice or treatment of that individual. Such concerns overcome any common law or First Amendment presumption to access.

Wherefore, counsel for Mr. Teyf respectfully prays for the sealing of his response to the Government's Motion filed at Doc. No. 134 until such time as counsel requests it to be unsealed. The undersigned also requests that the Clerk of Court be directed to provide the parties with filed copies of the Motion.

This the 7th day of February, 2019

/s/ James P. McLoughlin, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I also served a copy of the foregoing upon counsel for the United States in this action by sending a copy to each counsel by electronic communication as referenced below:

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